THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF THE TRIAL COURT

Hampshire Division Docket No.:

MICHAEL BARNETT, Plaintiff,

v.

EAST CAROLINA NEUROLOGY, INC., Defendant.

MOTION FOR ADMISSION PRO HAC VICE

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Harry L. Miles, Attorney for the Plaintiff Michael Barnett, hereby moves for leave to appear in this case for Attorney James K. Dorsett, III of Raleigh, North Carolina to appear *Pro Hac Vice* in this case. In support of this Motion, Harry L. Miles states as follows:

- I am one of the attorneys of record for Plaintiff, Michael Barnett, in this case. I am a partner in the firm of Green, Miles, Lipton, & Fitz-Gibbon, which has its offices at 77 Pleasant Street, Northampton, Massachusetts 01060.
- The Certificate of Good Standing of Attorney James K. Dorsett, III is attached to this Motion as Exhibit "A". As described in his attached Certificate, Attorney Dorsett is a member of the firm of Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, L.L.P., 2500 Wachovia Capital Center, P.O. Box 2611, Raleigh, North Carolina. He is an active member in good standing of the Bar of the State of

North Carolina, and has been since his admission in 1977. Attorney Dorsett is admitted to practice before the United States District Court for the State of North Carolina. Attorney Dorsett is not the subject of any disciplinary proceedings in any Bar to which he is admitted to practice, nor has he ever been disciplined by any court of record or by any Bar Association.

3. Attorney Dorsett requests special leave to this Court to appear solely for purposes of this case, and to be admitted to this Court on that basis Pro Hac Vice.

WHEREFORE, Attorney for the Plaintiff, Harry L. Miles, respectfully requests that this Honorable Court grant leave to Attorney Hargrove to appear in this case *Pro Hac Vice*, and for such other and further relief as this Court deems just and proper.

Dated at Northampton, November 10, 2003

Respectfully Submitted, The Plaintiff,

By his attorney,

Harry L. Miles

GREEN, MILES, LIPTÓN,

& FITZ-GIBBON

77 Pleasant Street

Post Office Box 210

Northampton, MA 01061-0210

Telephone: 413-586-8218 Facsimile: 413-584-6278

BBO# 209020

The North Carolina State Bar

| I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby |
|---|
| certify that James K. Dorsett, III (7695) is a member of the |
| North Carolina State Bar in good standing as of this date, and that the above named |
| attorney was duly licensed to practice law in this state on the 21 day of |
| August , 1977 . |
| has been on inactive membership |
| status with the North Carolina State Bar since |
| I further certify that as of this date there are no charges pending against the |
| above named attorney, and said attorney has not been disciplined by the North |
| Carolina State Bar. |
| Given over my hand and the Seal of the North Carolina State Bar, this |
| 29 day of <u>October</u> , 2003 . |
| , |
| A. Thomas Lyno) or |
| 01, 02m2 |

Secretary of the North Carolina State Bar

Certificate of Service

I, Harry L. Miles, Esquire, hereby certify that on this date, I served a copy of the foregoing document upon Attorney Susan H. Hargrove and Attorney James J. Dorsett, Jr., of the firm of Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, L.L.P., 2500 Wachovia Capital Center, P.O. Box 2611, Raleigh, North Carolina 27611-5908, by first class mail, postage prepaid.

Dated:

Harry L. Miles

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE TRIAL COURT

Hampshire Division Docket No.:

MICHAEL BARNETT, Plaintiff.

ν.

EAST CAROLINA NEUROLOGY, INC., Defendant.

MOTION FOR ADMISSION PRO HAC VICE

Harry L. Miles, Attorney for the Plaintiff Michael Barnett, hereby moves for leave to appear in this case for Attorney Susan H. Hargrove of Raleigh, North Carolina to appear *Pro Hac Vice* in this case. In support of this Motion, Harry L. Miles states as follows:

- 1. I am one of the attorneys of record for Plaintiff, Michael Barnett, in this case. I am a partner in the firm of Green, Miles, Lipton, & Fitz-Gibbon, which has its offices at 77 Pleasant Street, Northampton, Massachusetts 01060.
- 2. The Certificate of Good Standing of Attorney Susan H.

 Hargrove is attached to this Motion as Exhibit "A". As
 described in her attached Certificate, Attorney
 Hargrove is a member of the firm of Smith, Anderson,
 Blount, Dorsett, Mitchell & Jernigan, L.L.P., 2500
 Wachovia Capital Center, P.O. Box 2611, Raleigh, North
 Carolina. She is an active member in good standing of
 the Bar of the State of North Carolina, and has been

since her admission in 1992. Attorney Hargrove is admitted to practice before the United States District Court for the State of North Carolina. Attorney Hargrove is not the subject of any disciplinary proceedings in any Bar to which she is admitted to practice, nor has she ever been disciplined by any court of record or by any Bar Association.

3. Attorney Hargrove requests special leave to this Court to appear solely for purposes of this case, and to be admitted to this Court on that basis Pro Hac Vice.

WHEREFORE, Attorney for the Plaintiff, Harry L. Miles, respectfully requests that this Honorable Court grant leave to Attorney Hargrove to appear in this case Pro Hac Vice, and for such other and further relief as this Court deems just and proper.

Dated at Northampton, November 10, 2003

Respectfully Submitted,

The Plaintiff,

By his attorney

Harry/L. Miles

GREEN, MILES, LIPTON,

& FITZ-GIBBON

77 Pleasant Street

Post Office Box 210

Northampton, MA 01061-0210

Telephone: 413-586-8218 Facsimile: 413-584-6278

BBO# 209020

The North Carolina State Bar

| I, L. Thomas Lunsford, II, Secretary of the North Carolina State Bar, do hereby |
|---|
| certify that Susan H. Hargrove (18771) is a member of the |
| North Carolina State Bar in good standing as of this date, and that the above named |
| attorney was duly licensed to practice law in this state on the day of |
| April , 1992 . |
| has been on inactive membership |
| status with the North Carolina State Bar since |
| I further certify that as of this date there are no charges pending against the |
| above named attorney, and said attorney has not been disciplined by the North |
| Carolina State Bar. |
| Given over my hand and the Seal of the North Carolina State Bar, this |
| 29 day of October , 2003 . |
| , |
| |
| A. Thomas Juno or |

Secretary of the North Carolina State Bar

Certificate of Service

I, Harry L. Miles, Esquire, hereby certify that on this date, I served a copy of the foregoing document upon Attorney Susan H. Hargrove and Attorney James J. Dorsett, Jr., of the firm of Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, L.L.P., 2500 Wachovia Capital Center, P.O. Box 2611, Raleigh, North Carolina 27611-5908, by first class mail, postage prepaid.

Dated:

Harry L. Miles